

**UNITED STATES DISTRICT COURT**  
**WESTERN DISTRICT OF TEXAS**

FILED

2025 MAY 12 PM 3:56

CLERK, US DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

BY                       
SERIALIZED

**PAMELA DE SOMOV,**

Plaintiff,

v.

**JULIE BARNES** aka **JULIE ANNE BARNES** aka **JULIE BEAM**, and

**MARGARET P. SANO** aka **MEG SANO**,

Defendants.

Civil Action No.:                     

**1:25 CV 00717**

**RP**

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**MOTION FOR PRELIMINARY INJUNCTION**

Plaintiff, Pamela de Somov, respectfully moves this Court pursuant to Rule 65 of the Federal

Rules of Civil Procedure for a preliminary injunction enjoining Defendants from further  
defamation, harassment, and misuse of Plaintiff's name, likeness, and personal  
information.

## **I. INTRODUCTION**

Plaintiff seeks to preserve the status quo and prevent irreparable harm pending trial. Defendants have registered domain names in Plaintiff's legal name and used those domains to redirect to defamatory online content, including a Tumblr blog titled "scammerpam." Additionally, Defendants have impersonated Plaintiff online, created fake social media accounts, and posted harassing and defamatory content across multiple platforms.

## **II. FACTUAL BACKGROUND**

As fully set forth in the Verified Complaint and incorporated herein by reference, Defendants have continuously harassed and defamed Plaintiff since at least 2017 by:

- Registering pameladesomov.com and pameladesomov.net with bad faith intent to defame;
- Posting private and intimate personal details on the website and blog;
- Creating and maintaining a Facebook account titled "ScammerPam" using Plaintiff's image;
- Contacting Plaintiff's past and current employers with false and harmful claims;
- Publishing defamatory content that has resulted in lost employment, reputational harm, and emotional distress.

Defendants continue to renew these domains every two years, most recently on March 15, 2025, demonstrating their ongoing intent to cause harm.

Plaintiff, Pamela de Somov, has established distinct and enforceable common law trademark rights in her personal name through continuous commercial use in both the

fine arts and professional services industries. In her earlier career, Plaintiff worked professionally as a fine artist, specializing in plaster bas relief. Her work was recognized and published in a professionally distributed art book, in which she was formally credited under her full name and provided with her website, [www.pameladesomov.com](http://www.pameladesomov.com). This publication served as a platform to promote and sell her artwork, thereby establishing commercial use of her name. Plaintiff has since transitioned into real estate finance, where she currently works as a licensed Mortgage Loan Officer, publicly promoting her services under her full name through branded content and professional outreach. Her name has therefore acquired distinctiveness and secondary meaning in both the creative and professional sectors.

Despite clear notice of this legal action, Defendant Julie Barnes continues to post new defamatory content on the Tumblr blog "scammerpam" with no indication of ceasing her conduct. Her ongoing posts demonstrate an intent to persist in this harassment, compounding Plaintiff's harm and supporting the urgent need for injunctive relief.

### **III. LEGAL STANDARD**

To obtain a preliminary injunction, Plaintiff must show:

1. A substantial likelihood of success on the merits;
2. A substantial threat of irreparable harm if the injunction is not granted;
3. The threatened harm outweighs any harm to the Defendants;
4. The injunction will not disserve the public interest.

#### IV. ARGUMENT

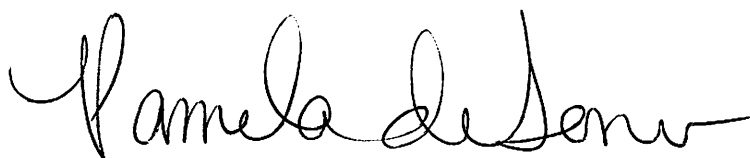
- **Likelihood of Success:** Plaintiff has demonstrated credible evidence of bad faith registration (ACPA), defamation, and intentional infliction of emotional distress.
- **Irreparable Harm:** Plaintiff continues to suffer reputational harm, loss of income, and emotional distress. Monetary damages alone are insufficient.
- **Balancing of Equities:** Defendants have no legitimate interest in Plaintiff's name or likeness; the harm to Plaintiff greatly outweighs any inconvenience to Defendants.
- **Public Interest:** Protecting individuals from online harassment and defamation promotes a just and orderly society.

#### V. RELIEF REQUESTED

Plaintiff respectfully requests that the Court enter an order:

1. Requiring Defendants to disable and take down the domains pameladesomov.com and pameladesomov.net;
  2. **Ordering the transfer of ownership of those domain names to Plaintiff** as the rightful owner of the common law trademark in her personal name;
  3. Requiring removal of the Tumblr blog at <https://scammerpam.tumblr.com>;
  4. Requiring deletion of the Facebook page "ScammerPam";
  5. Requiring cessation of any further defamatory postings, emails, or communications regarding Plaintiff;
  6. Prohibiting the registration of any domain name containing Plaintiff's name, likeness, or variations thereof.
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**Respectfully submitted,**

A handwritten signature in black ink, appearing to read "Pamela de Somov". The signature is fluid and cursive, with a long horizontal stroke at the end.

5/12/25

Pamela de Somov

Pro Se Plaintiff

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